

February 4, 2025

VIA ECF

The Honorable Victor Marrero
United States District Judge
500 Pearl Street, Courtroom 15B
New York, NY 10007

Re: United States v. Global Business Travel Group, Inc., et al., 1:25-cv-00215-VM

Dear Judge Marrero:

At the request of CWT Holdings, LLC (“CWT”), the United States seeks the Court’s leave to file under seal (1) the unredacted version of the United States’ Opposition to Defendants’ Motion for Reconsideration (the “Reconsideration Opposition”), with proposed redactions highlighted; (2) the unredacted version of the United States’ Opposition to CWT’s letter motion to seal Exhibit A of the Murray Declaration (the “Sealing Opposition”), with proposed redactions highlighted; and (3) the unredacted versions of Exhibits A through J to the Declaration of Jeffrey Vernon (the “Vernon Declaration”) in support of both motions, with proposed redactions highlighted in Exhibits A, B, and K. Contemporaneously with the filing of this letter motion, and in accordance with Section II.H of the Court’s Individual Rules, Section 6 of the Electronic Case Filing Rules & Instructions of the United States District Court for the Southern District of New York, and Paragraphs 48 through 50 of the Stipulated Protective Order, ECF No. 38, the United States is publicly filing on ECF (1) a redacted version of the Reconsideration Opposition; (2) a redacted version of the Sealing Opposition; (3) redacted versions of Exhibits A, B, and K to the Vernon Declaration; (4) a public version of Exhibit C to the Vernon Declaration; and (5) slipsheet replacements for Exhibits D through J to the Vernon Declaration.

The United States requests to provisionally seal and redact these documents because they contain information produced by CWT during the United States’ pre-complaint investigation that is designated Highly Confidential pursuant to Paragraphs 27 and 48 through 50 of the Stipulated Protective Order. In addition, as explained in the Sealing Opposition and in Exhibit K to the Vernon Declaration, counsel for CWT has notified the United States that it is designating all references to the subject matter contained in these documents as confidential.

For the same reasons that the United States opposes the sealing of Exhibit A to the Murray Declaration in its entirety (as set forth in the Sealing Opposition), the United States also opposes the sealing and redaction of the documents subject to the instant motion. The United States is solely seeking the temporary filing of these documents under seal pursuant to the request of CWT’s counsel. The United States would respectfully request that the Court deny the sealing of these documents and order CWT to propose narrower redactions that satisfy the standards for sealing from public access.

Pursuant to the Court’s Individual Practices, the United States identifies counsel for the United States, counsel for Amex GBT, and counsel for CWT as those who should have access to the sealed or unredacted versions of the filing.

Respectfully submitted,

/s/ Jeffrey Vernon

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